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September 18, 2014

By ECF

The Honorable Katherine B. Forrest, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 730
New York, New York 10007

Re: *Komolov, et al. v. Milani, et al.*
Case No.: 13-cv-573 (KBF)

Dear Judge Forrest:

On behalf of Plaintiffs, I respectfully submit this letter to request the Court's release of post-judgment discovery filed under seal by Defendant Nicholas Milani, pursuant to Your Honor's August 4, 2014 order (**ECF No. 74**) following the parties' July 31, 2014 Court conference.

At that conference, the Court established a September 5, 2014 deadline for Mr. Milani to file a motion if he wished to challenge the underlying judgment (in response to newly-retained counsel's request for time to explore personal jurisdiction issues).

The Court instructed Mr. Milani, in the interim, to file responses to Plaintiffs' post-judgment discovery demands from January 2014, including an information subpoena, and corporate information regarding Mr. Milani's ownership interest in Defendant Milani Packing, Inc.

Mr. Milani filed certain discovery under seal on August 22, 2014 (**ECF No. 83**).

With the September 5, 2014 deadline having passed without Mr. Milani challenging the judgment, Plaintiffs respectfully request that the Court release Mr. Milani's discovery responses that were filed under seal.

Moreover, Plaintiffs respectfully request that the Court order that Mr. Milani be produced for deposition (first noticed in January 2014) no later than October 16, 2014 at my firm's Manhattan office.

Thank you for your consideration.

Respectfully submitted,



PHILIP C. CHRONAKIS

cc: Jeffrey T. Millman, Esq.